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trade should be strictly construed should not override a reasonable construction of the intention of the parties.

CONSTITUTIONAL LAW—DELEGATION OF POWERS—REFERENDUM.—A statute concerning juries was passed by the legislature and was to become effective only after receiving a majority vote at a general referendum to the people of the state. *Held*, statute valid and not unconstitutional as a delegation of legislative powers. *Hudspeth v. Swayze* (N. J.), 89 Atl. 780. See NOTES, p. 632.

CORPORATIONS—CHARITABLE CORPORATIONS—LIABILITY FOR TORTS.—Where the plaintiff, a stranger, had accompanied a sick friend to a hospital, a charitable institution, and was injured by falling into an elevator shaft negligently left unprotected by the defendant, it was *held*, she can recover. *Hospital of St. Vincent v. Thompson* (Va.), 18 S. E. 13. See NOTES, p. 636.

CORPORATIONS—MANUFACTURING CORPORATIONS.—By a constitutional provision stockholders of manufacturing corporations were exempted from the liability there imposed on corporations generally. *Held*, a corporation for the generation of electricity for distribution to the public is a manufacturing corporation within the meaning of the provision. *Vencendor Inv. Co. v. Highland Canal & Power Co.* (Minn.), 145 N. W. 611.

The question whether a corporation for the generation of electricity is a manufacturing corporation under the various statutes and constitutional provisions is one on which the authorities are not in accord. Most of the older authorities and a number of the more recent cases hold that such a corporation is not a manufacturing corporation. *Frederick, Electric Light, etc., Co. v. Frederick*, 84 Md. 599, 36 Atl. 362; *Williams v. Park*, 72 N. H. 305, 56 Atl. 463.

In these cases the courts adhere to the earlier and more restricted definition of the word "manufacturer," holding, that to be a manufacturer one must produce a fabric or structure made from materials of some kind. In an early case it was said that on reason and principle a corporation for generating electricity should be held a manufacturing corporation but as the statute was meant to apply to those corporations which had, in the past, been considered as manufacturing corporations, the court held that the electric light company could not take advantage of the exemption allowed to manufacturing corporations. *Commonwealth v. Northern Electric Light Co.*, 145 Pa. St. 105, 22 Atl. 839. But recently in the same state it has been settled that corporations for generating electricity are manufacturing corporations within the terms of such statutes. *Commonwealth v. Keystone Electric, etc., Co.*, 193 Pa. St. 245, 44 Atl. 326. Modern authority favors such a construction of the laws regulating manufacturing corporations as to include within their terms, corporations for the production of electric currents. *People v. Wemple*, 129 N. Y. 543, 29 N. E. 808; *Beggs v. Edison Electric Co.*, 96 Ala. 295, 11 So. 381.